

Accounting DD
56-3117

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By:

LS 6-1637a

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25 August 1956

MEMORANDUM FOR: Chief, Technical Accounting Staff,
Office of the Comptroller

SUBJECT : Proposed Regulation

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1. We have the following comments on the proposed regulation.

a. With reference to paragraph 1b we would wonder whether paragraph 1b(1) is feasible, that is, whether the Finance Officer is in a position to determine that there is or is not a possibility of jeopardizing security. Also with reference to 1b, is it intended that five subparagraphs apply equally with respect to accepting checks for cash and for the payment of indebtednesses? Further, with respect to 1b(4), suggest the second sentence be deleted. With respect to 1b(5), suggest "and" be substituted for "or".

b. What is intended by "employee relationship" in paragraph 1c? Should this subparagraph not say that under no circumstances will checks "of persons who are not employees"?

c. Paragraph 1f seems to be misplaced, since the remaining subparagraphs concern more basic, policy points.

d. With reference to paragraph 4b should not the Chief of Station immediately advise headquarters of his success in collecting the amount or of his failure of success in those cases where the employee resigns in the field or is returning to the United States? This in order to enable headquarters to effect collection.

2. Our chief concern, however, goes to the question of whether the issuance should take the form of a regulation. The draft extends to over five pages, nearly all of which is of interest almost exclusively to Finance Officers in the field and at headquarters. We made this point in our June memorandum to which you replied in part that "the conditions under which personal checks will be cashed are of interest to individual employees." Doubtless this is true, but unless there is a great volume of personal checks being cashed by our field stations we would think this aspect alone would not justify issuing a regulation which would cross the desks of all of us and add to our already voluminous quantity of regulations.

3. I am sorry we did not note the points mentioned in paragraph 1 above when we wrote you in June. In any event, subject to those comments and to the point made in paragraph 2 we could not concur. The matter raised in paragraph 2, however, seems to be a fairly general and basic one and is of the type of problems which the ADD/S is concerned with in connection with his responsibilities to process DD/S proposed issuances under the DD/S memorandum on that subject of June 30. Therefore, although the proposed issuance originated prior to the DD/S memorandum, it is suggested that the proposal be forwarded to the ADD/S in accordance with the procedures outlined by the DD/S memorandum of 30 June.

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RICHARD H. LANSDALE
Assistant General Counsel

cc: Regulations Control Staff

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